

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

DECLARATION OF JEFFREY M. GOULD

I, Jeffrey M. Gould, hereby declare pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of my personal knowledge and belief:

1. I am Senior Counsel at Oppenheim + Zebtrak, LLP, and am admitted to practice law in the District of Columbia, among other jurisdictions. I am counsel for Plaintiffs in the above-captioned case.

2. I submit this declaration in support of Plaintiffs' Reply Memorandum in Support of Their Omnibus Motion *in Limine*.

3. A true and correct copy of the Court's summary judgment decision from *BMG* is attached hereto as **Exhibit 1**, with the relevant portions highlighted in green.

4. A true and correct copy of excerpts from the June 10, 2019 deposition transcript of Steven Marks is attached hereto as **Exhibit 2**.

5. A true and correct copy of an August 4, 2010 Cox internal email chain between Jason Zabek and Terran Williams (PX 264) is attached hereto as **Exhibit 3**.

6. A true and correct copy of a September 17 – October 28, 2019 email chain between Jeffrey M. Gould and Thomas Buchanan is attached hereto as **Exhibit 4**.

7. A true and correct copy of excerpts from the April 25, 2019 deposition transcript of Matthew E. Carothers is attached hereto as **Exhibit 5**.

Executed on November 6, 2019 in Washington, District of Columbia.

/s/ Jeffrey M. Gould